



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Chiverton to Carland Cross Scheme

An Examining Authority report prepared with the
support of the Environmental Services Team

Planning Inspectorate Reference: TR010026

21 May 2019

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TABLE OF CONTENTS

1. INTRODUCTION	1
1.1 BACKGROUND	1
1.2 DOCUMENTS USED TO INFORM THIS RIES	2
1.3 STRUCTURE OF THIS RIES.....	3
2. OVERVIEW	5
2.1 EUROPEAN SITES CONSIDERED	5
2.2 HRA MATTERS CONSIDERED DURING THE EXAMINATION.....	6
3. LIKELY SIGNIFICANT EFFECTS	8
3.1 SUMMARY OF HRA SCREENING OUTCOMES DURING THE EXAMINATION	13
4. ADVERSE EFFECTS ON INTEGRITY	144
4.1 CONSERVATION OBJECTIVES.....	144
4.2 THE INTEGRITY TEST.....	144
ANNEX 1 TABLE SHOWING THE UK EUROPEAN SITES IDENTIFIED BY THE APPLICANT AND CONSIDERED DURING THE EXAMINATION	
ANNEX 2 TABLE SHOWING THE PROJECTS INCLUDED IN THE APPLICANT'S IN COMBINATION ASSESSMENT	

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1 INTRODUCTION

1.1 Background

- 1.1.1 Highways England (the Applicant) has applied to the Secretary of State for a development consent order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed A30 Chiverton to Carland Cross (the application). The Secretary of State has appointed an Examining Authority (ExA) to conduct an examination of the application, to report its findings and conclusions, and to make a recommendation to the Secretary of State as to the decision to be made on the application.
- 1.1.2 The relevant Secretary of State is the competent authority for the purposes of the Habitats Directive¹ and the Habitats Regulations² for applications submitted under the PA2008 regime. The findings and conclusions on nature conservation issues reported by the ExA will assist the Secretary of State in performing their duties under the Habitats Regulations.
- 1.1.3 This report compiles, documents and signposts information provided within the DCO application, and the information submitted throughout the examination by both the Applicant and interested parties (IPs), up to Deadline 4 of the examination (1 May 2019) in relation to potential effects to European Sites³. It is not a standalone document and should be read in conjunction with the examination documents referred to. Where document references are presented in square brackets [] in the text of this report, that reference can be found in the Examination library published on the National Infrastructure Planning website at the following link:
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010026/TR010026-000541-A30%20Examination%20Library%20.pdf>
- 1.1.4 It is issued to ensure that IPs including the statutory nature conservation body: Natural England (NE), is consulted formally on Habitats Regulations matters. This process may be relied on by the Secretary of State for the purposes of Regulation 63(3) of the Habitats Regulations. Following consultation the responses will be considered by the ExA in making their recommendation to the Secretary of State and made available to the Secretary of State along with this report. The RIES will not be revised following consultation.

¹ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (as codified) (the 'Habitats Directive').

² The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).

³ The term European Sites in this context includes Sites of Community Importance (SCIs), Special Areas of Conservation (SACs) and candidate SACs, Special Protection Areas (SPAs), possible SACs, potential SPAs, Ramsar sites, proposed Ramsar sites, and any sites identified as compensatory measures for adverse effects on any of the above. For a full description of the designations to which the Habitats Regulations apply, and/ or are applied as a matter of Government policy, see PINS Advice Note 10.

- 1.1.5 The Applicant has not identified any potential impacts on European sites in other EEA States⁴. Only UK European sites are addressed in this report.

1.2 Documents used to inform this RIES

Application

- 1.2.1 The Applicant provided a Habitats Regulations Assessment Report (HRA) entitled Statement to Inform an Appropriate Assessment Report [APP-033] with the DCO application, together with appended screening and integrity matrices [APP-034 and APP-035].
- 1.2.2 The Statement to Inform an Appropriate Assessment concluded that there was no potential for likely significant effects on two European sites and provided screening matrices to support this. The same document concluded that there is the potential for likely significant effects on two European sites, namely Newlyn Downs SAC and Breney Common and Goss and Tregoss Moors SAC. Integrity matrices [APP-035] were included to support this conclusion.

Examination

- 1.2.3 A Statement of Common Ground between NE and the Applicant was submitted at Deadline 2 of the examination [REP2-018]. NE provided confirmation that they concur with the conclusions presented by the Applicant in the Statement to Inform an Appropriate Assessment. The following documents were used in the production of this RIES.

Application Documents

- Draft Development Consent Order [APP-004]
- Environmental Statement (ES) Chapter 2 – The Project [APP-055]
- ES Chapter 5 Air Quality [APP-058]
- ES Chapter 8 Ecology and Nature Conservation [APP-061]
- ES Chapter 13 Road Drainage and the Water Environment [APP-066]
- ES Chapter 15: Consideration of Cumulative Effects [APP-068]
- Statement to Inform an Appropriate Assessment [APP-033]
- Statement to Inform an Appropriate Assessment Appendix 1 – Screening Matrices [APP-034]
- Statement to Inform an Appropriate Assessment Appendix 2 – Integrity Matrices [APP-035]
- Statement to Inform an Appropriate Assessment Appendix 3 – Air Quality Calculations [APP-036]

⁴ European Economic Area (EEA) States.

- Statement to Inform an Appropriate Assessment Appendix 4 – NATURA 2000 Citations [APP-037]
- Statement to Inform an Appropriate Assessment Appendix 5 – NVC Habitat mapping for the area around the A30 at Breney Common SAC [APP-038]
- Statement to Inform an Appropriate Assessment Appendix 6 – Habitat within 10m of the A30 at Breney Common SAC [APP-039]
- Statement to Inform an Appropriate Assessment Appendix 7 – European Sites Air Quality Screening Process [APP-040]
- Statement to Inform an Appropriate Assessment Appendix 8 – Key correspondence with Natural England relating to HRA [APP-041]
- Statement to Inform an Appropriate Assessment Appendix 9 – Marsh Fritillary Habitat [APP-042]
- Statement to Inform an Appropriate Assessment Appendix 10 – DMRB Screening Matrices [APP-043]
- ES Appendix 8.10 – Fish Survey Report [APP-340]
- ES Appendix 8.16 – Otter Survey Report [APP-346]

Statements of Common Ground

- 7.4 Statements of Common Ground [APP-048]
- 7.4(A) Statements of Common Ground [REP1-003]
- 7.4.2 Statement of Common Ground with Natural England [REP2-018]

Deadline 3

- Outline Construction Management Plan (CEMP) [REP3-012]

1.3 Structure of this RIES

1.3.1 The remainder of this report is structured as follows:

- **Section 2** identifies the European sites that have been considered within the DCO application and during the examination period, up to 1 May 2019. It provides an overview of the issues that have emerged during the examination.
- **Section 3** identifies the European sites and qualifying features screened by the Applicant for potential likely significant effects, either alone or in-combination with other plans and projects. The section also identifies where IPs have disputed the Applicant's conclusions, together with any additional European sites and

qualifying features screened for potential likely significant effects during the examination.

- **Section 4** identifies the European sites and qualifying features which have been considered in terms of adverse effects on site integrity, either alone or in-combination with other plans and projects.
- **Annex 1** lists the sites and qualifying features considered during the examination. It also identified which sites and features the Applicant concluded would be likely to experience significant effects, the consideration of potential adverse effects on site integrity and the view of NE on the Applicant's conclusion.
- **Annex 2** lists the sites which were identified by the Applicant in their in-combination assessment.

2 OVERVIEW

2.1 European Sites Considered

- 2.1.1 The Proposed Development is not connected with or necessary to the management for nature conservation of any of the European sites considered within the Applicant’s assessment [APP-033].
- 2.1.2 The Applicant’s Statement to Inform an Appropriate Assessment identified the following European sites and features for which the UK is responsible for inclusion within the assessment:

Table 2.1: European sites and qualifying features considered in the Applicant’s HRA Report.

Name of European Site	Features
Newlyn Downs SAC	Temperate Atlantic heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>
	European dry heaths
Fal and Helford SAC	Sandbanks which are slightly covered by sea water all the time
	Mudflats and sandflats not covered by seawater at low tide
	Large shallow inlets and bays
	Atlantic salt meadows
	Estuaries
	Reefs
	Shore dock
Brenay Common and Goss and Tregoss Moors SAC	Northern Atlantic wet heaths with <i>Erica tetralix</i>
	European dry heaths
	Transition mires and quaking bogs
	Marsh fritillary butterfly (<i>Euphydryas (Eurodryas, Hypodryas) aurinia</i>)
River Camel SAC	European dry heaths
	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles
	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)
	Bullhead (<i>Cottus gobio</i>)

	Otter (<i>Lutra lutra</i>)
	Atlantic salmon (<i>Salmo solar</i>)

- 2.1.3 The Applicant’s assessment relies on the screening criteria defined within the Highways England Design Manual for Roads and Bridges (DMRB) to determine the extent of the zone of influence of the Proposed Development in relation to European sites. The zone of influence extends to include the following:
- European sites located within 2km of the Proposed Development;
 - European sites beyond the 2km radius that are hydraulically linked to the Proposed Development;
 - European sites within 30km of the Proposed Development where bats are a qualifying feature; and
 - European sites within 200m of the Affected Road Network.
- 2.1.4 The screening process applied by the Applicant resulted in the identification of four European sites with the potential to be affected by the Proposed Development.
- 2.1.5 A plan showing the location of the European sites considered by the Applicant is provided in Statement to Inform an Appropriate Assessment (SIAA) Appendix 6 ‘Habitat Within 10m of the A30 at Breney Common SAC’ [APP-039]. Figure 1.3 Environmental Constraints Plan [APP-079] shows the location of the Newlyn Downs SAC in relation to the Proposed Development.
- 2.1.6 No additional European sites were identified during the examination by NE or any IPs.

2.2 HRA Matters Considered During the Examination

- 2.2.1 As detailed further in Section 3 of this report, the Applicant’s screening assessment identified the potential for likely significant effects, either alone or in-combination with other plans or projects, on two of the four European sites considered in the HRA report [APP—033].
- 2.2.2 A question was raised during the examination regarding the impacts which the Proposed Development may have on air quality, particularly in relation to Breney Common and Goss and Tregoss Moors SAC. A potential significant effect was identified for the Breney Common and Goss and Tregoss Moors SAC. This was identified on the basis that the 1% threshold (0.3µg/m³) would be exceeded by the Proposed Development and could result in overall exceedances of the vegetation criterion critical load (CL) (30 µg/m³). The increased emission levels were predicted to occur between 0-10 meters from the highway boundary. Further investigation found that 0.2% of the total area of the SAC lies within 10m of the Affected Road Network and of this area, only a small part was found to contain any Annex 1 Habitat for which the SAC has been designated – H4c *Ulex gallii* *Agrostis curtisii* heath, *Erica*

tetralix sub-community. As such a small amount of the qualifying habitat may be affected, it was concluded that having regard to the magnitude of the impact the effect would be of neutral significance.

- 2.2.3 NE were asked to confirm if they were satisfied with this conclusion. NE did not provide a specific response to this question. This question was raised again during the Second Written Questions which were published on 21 May 2019.
- 2.2.4 At Deadline 2, a final signed SoCG with all matters agreed with NE was submitted.

3 LIKELY SIGNIFICANT EFFECTS

- 3.0.1 This section of the RIES provides a summary of the HRA matters considered during the Examination up to Deadline 4 (1 May 2019).
- 3.0.2 The Applicant has described how they have determined what would constitute a 'significant effect' within Section 3.3 of the HRA report [APP-033]. This follows EC guidance on habitats assessment (EC Guidance document: 'Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (2000)' and EC Guidance document: 'Assessment of plans and projects significantly affecting Natura 2000 sites (2001)').
- 3.0.3 The HRA Report [APP-033] identified that having regard to the types of qualifying features present in the designated sites and the type of works involved in the Proposed Development, the following impacts were assessed at the screening stage which have the potential to result in likely significant effects:
- Changes in air quality from atmospheric pollution associated with increased traffic (Newlyn Downs SAC, River Camel SAC and Breney Common and Goss and Tregoss Moors SAC);
 - Changes in air quality from atmospheric pollution associated with construction activities (Newlyn Downs SAC);
 - Changes in water quality (Fal and Helford SAC and Newlyn Downs SAC);
 - Impacts on the management of the site (Newlyn Downs SAC);
 - Changes in hydrological conditions (Newlyn Downs SAC); and
 - Inappropriate management and introduction of invasive species (Newlyn Downs SAC).

In-combination effects

- 3.0.4 The Applicant has addressed potential in-combination effects within Section 3.3.47 of their HRA report [APP-033] and ES Chapter 15 Consideration of Cumulative Effects.
- 3.0.5 The Applicant identified a number of other development proposals to be considered in the in-combination assessment. These were subject to an initial screening to assess whether, given the nature, location and scale of each proposal, they could produce impacts that combine with the impacts of the Proposed Development and lead to a likely significant effect on any of the four European sites (and qualifying features) considered.
- 3.0.6 In-combination effects for a total of 75 projects were screened by the Applicant. Following the criteria provided in Table 15-3 of ES Chapter 15 Consideration of Cumulative Effects; the long list was used and reduced to a short list of 11 relevant projects which were included within the cumulative assessment.
- 3.0.7 The relevant projects which have been included in the in-combination assessment carried out by the Applicant are contained in Annex 2.

- 3.0.8 The scope of the in-combination assessment was not disputed by NE or any other IPs during the examination.
- 3.0.9 The Applicant's screening assessment [APP-033] concluded that the Proposed Development would have **no likely significant effect**, either alone or in-combination with other plans or projects, on the qualifying features of the European sites listed below:
- Fal and Helford SAC
 - River Camel SAC
- 3.0.10 The Applicant's conclusions in relation to these sites and their features **were not disputed** by any IPs during the examination.
- 3.0.11 As a result of the screening assessment, the Applicant concluded that the project is **likely to give rise to significant effects**, either alone or in-combination with other plans or projects, on the qualifying features of the European site(s) listed below:
- Newlyn Downs SAC
 - Breney Common and Goss and Tregoss Moors SAC
- 3.0.12 The Applicant's conclusion of potential likely significant effects on those European sites and their qualifying features identified in Table 3.1 **were not disputed** by any IPs during the examination.

Table 3.1: The Applicant's screening exercise and degree of agreement with Interested Parties

Features	Screening result*: LSE alone or in combination?	Agreed with SCNB and other relevant parties?	Assessment of effects on integrity required?	Agreed with SNCB and other relevant parties?
European site name: Newlyn Downs SAC				
Temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]
European dry heaths	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]
European site name: Fal and Helford SAC				
Sandbanks which are slightly covered by sea water all the time	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Mudflats and sandflats not covered by seawater at low tide	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Large shallow inlets and bays	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Atlantic salt meadows (<i>GlaucoPuccinellietalia maritimae</i>)	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Estuaries	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Reefs	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]

Features	Screening result*: LSE alone or in combination?	Agreed with SCNB and other relevant parties?	Assessment of effects on integrity required?	Agreed with SNCB and other relevant parties?
Shore dock <i>Rumex rupestris</i>	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
European site name: River Camel SAC				
European dry heaths	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Old sessile oak woods with <i>Ilex and Blechnum</i> in the British Isles	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Alluvial forests	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Bullhead	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Otter	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
Atlantic salmon	No [APP-034]	Yes [APP-034]	No [APP-034]	Yes [APP-034]
European site name: Breney Common and Goss and Tregoss Moor SAC				
Northern Atlantic wet heaths with <i>Erica tetralix</i>	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]
European dry heaths	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]
Transition mires and quaking bogs	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]
Marsh fritillary butterfly	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]	Yes [APP-034]

*From Applicant's HRA report and screening matrices [APP-034].

3.1 Summary of HRA Screening outcomes during the examination

- 3.1.1 A total of four European sites were screened by the Applicant prior to examination (see Table 2.1). Of these sites, the Applicant concluded that there would be no likely significant effect on two European sites and their qualifying features (see Table 3.1). NE did not dispute the Applicant's conclusion of no likely significant effects on these European sites and their qualifying features during the examination.
- 3.1.2 The Applicant concluded likely significant effects on two European sites (Table 3.1). NE did not dispute the Applicant's conclusion for these European sites and qualifying features. These sites are discussed further in Section 4 to this report.

4 ADVERSE EFFECTS ON INTEGRITY

4.1 Conservation Objectives

4.1.1 The Applicant provided the conservation objectives for the European sites in Tables 4-1 and Table 4-3 of the HRA report [APP-033].

4.2 The Integrity Test

No Adverse Effects on Site Integrity

4.2.1 For Newlyn Downs SAC and Breney Common and Goss and Tregoss Moors SAC the potential for a likely significant effect could not be ruled out at the screening stage. These sites were taken forward to the appropriate assessment stage.

4.2.2 Adverse effects on Newlyn Downs SAC from the Proposed Development were identified as:

- changes in air quality from atmospheric pollution associated with construction activities;
- changes in water quality during construction and operation;
- changes in hydrological conditions;
- inappropriate management and introduction of invasive species; and
- in-combination effects.

4.2.3 The Applicant concluded in their Integrity matrices that due to the location of the European site relative to the nearest construction works, the risk to the European site would be negligible. Furthermore, the Applicant concluded in their Integrity matrices that a review of the hydrogeological setting of the Proposed Development and the Newlyn Downs SAC concluded that the bedrock formations underlying both sites are unlikely to be in hydraulic continuity. Invasive species would be managed through measures implemented in the CEMP. The Applicant therefore concluded that an adverse effect on the integrity of the European site can be excluded, as shown in Table 4.1 below.

4.2.4 Adverse effects on Breney Common, Goss and Tregoss Moors SAC from the Proposed Development were identified as being from changes to air quality during operation. The Applicant provided an explanation in their Integrity Matrices [APP-035] that there would only be very small increases in nitrogen deposition and therefore the upper limit of CL is not predicted to be exceeded. The Applicant concluded that an adverse effect on the integrity of the European site can be excluded, as shown in Table 4.1 below.

4.2.5 The Applicant's conclusions in relation to the sites and features listed below and shown in the Table were not disputed by any Interested Parties.

Table 4.1: European sites considered for adverse effects in site integrity

Name of European site	Qualifying Features	Potential Adverse Effect on Integrity?*	Agreed with SCNB and other relevant parties?
Newlyn Downs SAC	Temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>	No	Yes
	European dry heaths	No	Yes
Breney Common, Goss and Tregoss Moors SAC	Northern Atlantic wet heaths with <i>Erica tetralix</i>	No	Yes
	European dry heaths	No	Yes
	Transition mires and quaking bogs	No	Yes
	Marsh fritillary butterfly	No	Yes

*From Applicant's HRA report [APP-033] and integrity matrices [APP-035].

ANNEX 1: EUROPEAN SITES AND FEATURES CONSIDERED

Name of European Site	Qualifying Interest Feature	Potential for likely significant effects?	Potential for adverse effect on integrity?	Agreed with NE and other relevant parties?
Newlyn Downs SAC	Temperate Atlantic heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>	Yes	No	Yes
	European dry heaths	Yes	No	Yes
Fal and Helford SAC	Sandbanks which are slightly covered by sea water all the time	Yes	No	Yes
	Mudflats and sandflats not covered by seawater at low tide	Yes	No	Yes
	Large shallow inlets and bays	Yes	No	Yes
	Atlantic salt meadows	Yes	No	Yes
	Estuaries	Yes	No	Yes
	Reefs	Yes	No	Yes
	Shore dock	Yes	No	Yes
Breney Common and Goss and Tregoss Moors	Northern Atlantic wet heaths with <i>Erica tetralix</i>	Yes	No	Yes

Report on the Implications for European Sites for
Chiverton to Carland Cross Scheme

SAC	European dry heaths	Yes	No	Yes
	Transition mires and quaking bogs	Yes	No	Yes
	Marsh fritillary butterfly (<i>Euphydryas</i> (<i>Eurodryas</i> , <i>Hypodryas</i>) <i>aurinia</i>)	Yes	No	Yes
River Camel SAC	European dry heaths	Yes	No	Yes
	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles	Yes	No	Yes
	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)	Yes	No	Yes
	Bullhead (<i>Cottus gobio</i>)	Yes	No	Yes
	Otter (<i>Lutra lutra</i>)	Yes	No	Yes
	Atlantic salmon (<i>Salmo solar</i>)	Yes	No	Yes

ANNEX 2: PROJECTS IDENTIFIED DURING IN-COMBINATION ASSESSMENT

Application reference	Proposal
PA15/02972	Proposed erection of a 1 x 1.5 Mw wind turbine, transformer, grid connection, access road and ancillary infrastructure.
PA16/08707	Application for removal of condition 9 of application PA14/04515 (Development of ultra eco office space as an extension to existing office space and proposed solar array)
PA15/06100	Proposed construction of roadside hotel and restaurant adjacent to A30 trunk road
PA14/08092	Outline mixed use proposal for retail (Use Class A1) with associated petrol filling station and car parking (providing space for mobile library), food and drink (Use Classes A3, A4 and A5)/day nursery (Use Class D1) and residential (Use Class C3) alongside the provision of a community and sports facility (Use Classes D1 and D2), public open space (including formal playing pitch provision), and other associated infrastructure (inclusive of linkage to consented Langarth/Stadium sites). [Means of access to be determined only]
PA14/07885	Residential development comprising the erection of 24 units
PA15/11489	Reserved matters approval following outline PA11/06124 for layout, appearance, landscaping and scale related to the construction of 494 dwelling houses (use class C3) and internal roads/paths alongside the creation of areas of public open space and realm, and landscaping.
PA16/09294	Erection of 14 hybrid office/industrial units (B1 Use Class) together with car parking and landscaping.
PA14/10755	Outline approval with all matters other than access reserved for 435 dwellings, nursing home, food store, petrol station; 1 form entry primary school, community hall, public house/restaurant, central

Report on the Implications for European Sites for
Chiverton to Carland Cross Scheme

	component of the Northern Access Road (NAR) (including vehicular/pedestrian/cycle details), public open space, service diversions and foul and surface water drainage infrastructure, ground remodelling works including moving of material on and offsite and demolition of existing buildings and detailed approval of access point from the A390.
PA17/00957	Installation of a two 500 kw EWT wind turbines with tip heights of 76 m, with three blades and a rotor blade diameter of 54 m for the purpose of generating renewable energy (decision PA13/00848) with variation of submitted plans to allow amended access track and amended overall tip height of turbines to 77m.
PA14/00703	Hybrid planning application comprising in outline up to 515 dwellings (including extra care), school, employment space, convenience shop, community pavilion, infrastructure works, landscaping and public open spaces; district centre including supermarket, petrol station, retail units, community hall, restaurant/cafe uses, hotel, creche, medical centre, mobile library parking, parking and servicing; and in detail access from the A390, the Northern Access Road and connections to Penventinnie Lane within the Royal Cornwall Hospital. Including Environmental Impact Assessment.
PA15/00502	Proposed residential development comprising 84 dwellings and associated works - (non material amendment in relation to decision notice PA14/10306) - Substitution of proposed houses type P303 with P401 house type on plot 60, moving garage next to and connected to plots 59's and revision of tandem bays to plot 61-62 and the access path to plot 60-63 to suit.